

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

Andrea Watson-Lindsey fka Andrea	:	Case No. 19-24544-GLT
C. Watson fka Andrea C. Griffin	:	
Debtor(s)	:	Chapter 13
Community Loan Servicing, LLC fka	:	
Bayview Loan Servicing, LLC	:	
Movant(s)	:	Related to Document 83
vs.	:	Hearing Date: 9/22/21 at 9:00 a.m.
Andrea Watson-Lindsey fka Andrea	:	
C. Watson fka Andrea C. Griffin	:	
Respondent(s)	:	
and	:	
Ronda J. Winnecour, Trustee	:	
Additional Respondent	:	

CHAPTER 13 TRUSTEE'S RESPONSE TO MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY

RONDA J. WINNECOUR, Chapter 13 Trustee, responds as follows:

1. Community Loan Servicing, LLC FKA Bayview Loan Servicing, LLC requests relief from stay with regard to the property located at 2538 Allequippa Street. The Motion pleads an August 2021 payoff of \$22,198.58.

2. Debtor's Schedules list the value of the property as \$99,000.00. The Motion does not dispute Debtor's valuation.

3. Other than a municipal lien in favor of the Pittsburgh Water and Sewer Authority in the amount of \$385.15 (Claim No. 10), neither the Motion nor Debtor's schedules allege the existence of any additional liens against the property.

4. There appears to be a substantial equity cushion in the property that provides adequate protection for the creditor and relief from stay should be denied on that basis.

5. It is admitted that Debtor's plan payments are delinquent. Debtor has not made a plan payment since a partial payment in April 2021, and through August 2021

Debtor's plan payment arrears total \$16,044.09.

6. The estate has an interest in the equity in the property. If the Debtor cannot propose a feasible plan that will pay the secured creditor, or otherwise implement a sale of the property within a reasonable period of time, the Trustee requests that the case be converted to Chapter 7 so a Trustee can sell the property and realize its value.

WHEREFORE, the Trustee respectfully requests that the motion be denied.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: August 13, 2021

By: /s/ James C. Warmbrodt  
James C. Warmbrodt, PA I.D. 42524  
Attorney for Chapter 13 Trustee  
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CERTIFICATE OF SERVICE

I hereby certify that on the 13<sup>th</sup> of August 2021, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
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Pittsburgh PA. 15222

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Pittsburgh, PA 15235

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/s/Rosa M. Richard  
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